Case: 4:22-cv-00840-SRC Doc. #: 1-1 Filed: 08/10/22 Page: 1 of 22 22 el C 106392

IN THE CIRCUIT COURT OF ST. LOUIS CITY STATE OF MISSOURI

MICHAEL SMITH,)	
Plaintiff,)	Case No.
v.)	
BRANCH INTERMEDIATE SCHOOL DISTRICT)	JURY TRIAL DEMANDED
Serve at: 370 Morse Street	j	
Coldwater, MI 49036)	
And	j	
Suzanne Coco)	
Serve at: 520 Hickory Lane)	
Coldwater, MI 49036)	
Defendants)	
	,	

PETITION

COMES NOW Plaintiff, Michael Smith, by and through his attorneys of record, Goldblatt & Singer, and for his causes of action against Defendants Branch Intermediate School District and Suzanne Coco, states the following.

GENERAL ALLEGATIONS

- 1. At all times herein mentioned, Plaintiff Michael Smith (hereinafter "Smith") was a resident of the State of Missouri.
- 2. Defendant Suzanne Coco (hereinafter "Coco") is a resident of Michigan.
- 3. Defendant Branch Intermediate School District is a school district in Michigan.
- 4. On or about October 16, 2019, Plaintiff was driving his vehicle northbound on I-55 in St. Louis City, Missouri, when Defendant, who was also driving north on I-55 slammed into the rear of the vehicle Plaintiff was driving.
- 5. The collision was sudden and violent, causing serious injuries to the Plaintiff.

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- 6. At all relevant times, Defendant Coco was an agent, servant, and/or employee of Defendant Branch Intermediate School District (hereinafter "Branch District"), and was acting within the course and scope of such agency, servitude, and/or employment. Defendant Branch District is therefore vicariously liability for the negligent acts and/or omissions of Defendant Coco under the doctrine of respondeat superior.
- 7. The tortious acts, and the injuries caused, as discussed herein, occurred in St. Louis City, Missouri, providing this Court with jurisdiction and venue over the matter.

COUNT I NEGLIGENCE (As against Defendants Branch District and Coco)

- 8. Plaintiff realleges and incorporates paragraphs 1-8 above as if fully set forth herein.
- 9. At the aforementioned place and time, Defendant Coco negligently failed to keep the vehicle she was operating under proper control, resulting in a serious car wreck.
- 10. Defendant Coco had a duty to use the highest degree of care in the operation of the motor vehicle she was driving, to follow the rules of the road, and to operate the vehicle she was driving in a good, safe manner.
- 11. The aforesaid collision and the injuries and damages to Plaintiff, as described below, were the direct and proximate result of the negligent, careless acts and omissions of Defendant Coco in one, more, or all of the following particulars, to wit:
 - a. Defendant failed to be attentive to the roadway;
 - b. Defenant failed to keep a careful lookout;
 - c. Defendant drove in a manner that was too fast for the conditions existing at the time;
 - d. Defendant negligently permitted the vehicle she was driving to come into contact with the vehicle Plaintiff was travelling in;
 - e. Defendant failed to keep the vehicle she was operating under proper control;

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f. Defendant knew or by the highest degree of care could have known that there was a reasonable likelihood of a wreck in time thereafter to have stopped, swerved, and/or slackened speed, but Defendant failed to do so;

- g. Defendant failed to yeild the right-of-way to the vehicle Plaintiff was travelling in; and,
- h. Defendant rear-ended the vehicle plaintiff was riding in, and, therefore, the Defendant is presumptively negligent under the rear-end collision doctrine.
- 12. Defendant Coco's negligence, carelessness, faults, and omissions, as aforesaid, directly and proximately caused or contributed to cause Plaintiff to sustain pain, suffering and bodily injury to his left shoulder, neck, back, left leg, left arm, and head. Due to his injuries, Plaintiff required care and treatment from physicians and other health care professionals, all at substantial expense. Plaintiff was caused and continues to have pain, suffering, the ordinary emotional distress that goes with a car wreck and resulting injuries, loss of quality of life and inconvenience.
- 13. As a direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff lost wages.
- 14. As a direct and proximate result of Defendant's carelessness and negligence described herein,

 Plaintiff incurred treatment expenses in an amount not yet determined and will incur

 treatment expenses in the future.

WHEREFORE, Plaintiff respectfully prays for judgment against Defendants Coco and Branch District for damages that are fair and reasonable, for costs incurred herein, and for all other such damages that the Court deems just and proper under the circumstances.

COUNT II NEGLIGENCE PER SE (As against Defendants Branch District and Coco)

15. Plaintiff realleges and incorporates paragraphs 1-14 above as if fully set forth herein.

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16. The above-described collision was caused by the *per se* negligence of Defendant Coco as follows:

(a) RSMo. §304.017 states:

Distance at which vehicle must follow, penalty. — 1. The driver of a vehicle shall not follow another vehicle more closely than is reasonably safe and prudent, having due regard for the speed of such vehicle and the traffic upon and the condition of the roadway. Vehicles being driven upon any roadway outside of a business or residence district in a caravan or motorcade, whether or not towing other vehicles, shall be so operated, except in a funeral procession or in a duly authorized parade, so as to allow sufficient space between each such vehicle or combination of vehicles as to enable any other vehicle to overtake or pass such vehicles in safety. This section shall in no manner affect section 304.044 relating to distance between trucks traveling on the highway. Plaintiff was within the class of persons intended to be protected by RSMo. §304.012

- 17. Plaintiff was a member of the class of persons that RSMo. §304.017 was intended to protect, and the injuries sustained by Plaintiff were of the type said statute was designed to prevent.
- 18. At the aforesaid date and time, Defendant Coco operated the vehicle she was driving more closely than is reasonably safe and prudent to Plaintiff's vehicle, having due regard for the speed of such vehicle and the traffic upon and the condition of the roadway in violation of RSMo. §304.017 and was thereby *negligent per se*.
- 19. Defendant Coco's violation of RSMo. §304.017 directly caused or directly contributed to cause Plaintiff to sustain bodily injury and damages as detailed above.

WHEREFORE, Plaintiff respectfully prays for judgment against Defendants Branch District and Coco, for damages that are fair and reasonable, for costs incurred herein, and for all other such damages that the Court deems just and proper under the circumstances.

COUNT III NEGLIGENCE PER SE (As against Defendants Branch District and Coco)

- 20. Plaintiff realleges and incorporates paragraphs 1-19 above as if fully set forth herein.
- 21. The above-described collision was caused by the *per se* negligence of Defendant Coco as follows:

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(b) RSMo. §304.012(1-2) states:

Every person operating a motor vehicle on the roads and highways of this state shall drive the vehicle in a careful and prudent manner and at a rate of speed so as not to endanger the property of another or the life or limb of any person and shall exercise the highest degree of care

- 22. Plaintiff was a member of the class of persons that RSMo. §304.012 was intended to protect, and the injuries sustained by Plaintiff were of the type said statute was designed to prevent.
- 23. At the aforesaid date and time, Defendant Coco operated the vehicle she was driving without exercising the highest degree of care and not in a safe and prudent manner and therefore violated RSMo. §304.012.
- 24. Defendant Coco's violation of RSMo. §304.012 directly caused or directly contributed to cause Plaintiff to sustain bodily injury and damages as detailed above.

WHEREFORE, Plaintiff respectfully prays for judgment against Defendants Branch District and Coco, for damages that are fair and reasonable, for costs incurred herein, and for all other such damages that the Court deems just and proper under the circumstances.

Respectfully Submitted:

Goldblatt + Singer

/s/Shaun M. Falvey
SHAUN M. FALVEY #55294
sfalvey@stlinjurylaw.com
8182 Maryland Ave., Ste. 801
St. Louis, MO 63105
(314) 231-4100
(314) 241-5078 - fax

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2222-CC06392

In the **CIRCUIT COURT** City of St. Louis, Missouri



For File Stamp Only

Michael Smith	Cools City		
Plaintiff/Petitioner	July 6, 2022		
	Date		
vs.			
Branch Intermediate School District, et al.	Case number		
Defendant/Respondent			
	Division	L.	L

REQUEST	FOR APPOINTMENT	OF PROCESS	SERVER
District		-	

REQUEST FOR APPOINT	HEILL OF P	NOCESS SERV	En
Comes now Plaintiff			, pursuant
	ting Party		· '
to Local Rule 14, requests the appointmer	t by the Circuit	Clerk of	
Mark Smith, Markell & Associates	2300 West Port	Plaza #202, St. Louis	314.469.5555
Name of Process Server	Address		Telephone
Name of Process Server	Address		Telephone
Name of Process Server	Address		Telephone
to serve the summons and petition in this	cause on the be	elow named parties.	
SERVE: Branch Intermediate School District	SERV Suzani	E: ne Coco	
Name 370 Morse Street	Name 520 Hid	ckory Lane	
Address Coldwater, MI 49036	Address Coldwa	ater, MO 49036	
City/State/Zip	City/Sta	te/Zip	
SERVE:	SERV	E:	
Name	Name		
Address	Address	i	
City/State/Zip	City/State	e/Zip	
Appointed as requested:			
TOM KLOEPPINGER, Circum Clerk	Shaun	M. Falvey	
THE MINING	55294	//Plaintiff/Petitioner	
Deputy Clerk	Bar No. 8182 N	laryland, Ste. 202, St. L	ouis, MO 63105
1/10/2/20	Address 314-23	1-4100	
Date // C/	Phone N	No.	

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IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Mocecur			(11		
Judge or Division: MICHAEL FRANCIS STE	LZER	Case Number: 2222-CC06392			
Plaintiff/Petitioner: MICHAEL SMITH		Plaintiff's/Petitioner's Attorney/Ac SHAUN MICHAEL FALVEY	ldress:		
		BROWN & CROUPPEN 1 METROPOLITAN SQ STE 1600			
	VS.	SAINT LOUIS, MO 63102	-		
Defendant/Respondent: BRANCH INTERMEDIAT	E SCHOOL DISTRICT	Court Address: CIVIL COURTS BUILDING		(Date File Star	np)
Nature of Suit: CC Pers Injury-Vehicular		10 N TUCKER BLVD SAINT LOUIS, MO 63101			
Sı		nal Service Outside the State scept Attachment Action)	te of Missou	ri	
The State of Missouri to:	BRANCH INTERMEDIAT				
370 MORSE STREET	Alias:	ſ	······································	······································	versi alementika je godina province.
COLDWATER, MI 49036			SPECIAL	PROCESSS	BERVER
COURT SEAL OF	which is attached, and the plaintiff/petitioner at the	appear before this court and to file to serve a copy of your pleading up above address all within 30 days	oon the attorney after service of	y for the this summons	s upon
(8(3)(8)		y of service. If you fail to file your p	oleading, judgm	ent by defaul	t will be
	July 6, 2022	e relief demanded in this action.	7 111		
CITY OF ST LOUIS			Romas Illa	eppinger	<u></u>
	Date Further Information:		Clerk	· · · · · ·	
I certify that:	Officer's	or Server's Affidavit of Service	-		
	serve process in civil action	s within the state or territory where the	above summon	s was served.	
 My official title is I have served the a 	bove summons by: (check	of one)	County, _		(state).
delivering a co	py of the summons and a c	opy of the petition to the defendant/res	spondent.		
defendant/resp	ondent with	y of the petition at the dwelling place o	of the defendant's		family
		resides with the defendant/responder copy of the summons and a copy of the			
		(name)			(title).
other:			11.		 ,
Served at				(2	
in	County,	(state), on	(date) at	· · · -	_ (time).
Drinted Nor	ne of Sheriff or Server		Signature of Sher	iff as Casas	
		before me this (day)		nonth)	(year).
	I am: (check one) 🔲 th	e clerk of the court of which affiant is a judge of the court of which affiant is	an officer.		
(Seal)	☐ ai	uthorized to administer oaths in the sta		ffiant served th	e above
,		ummons. (use for out-of-state officer) uthorized to administer oaths. (use for	: r court-appointed	server)	
			Signature and Titl	·	
			Jugualuit dilu IIII	,	

	e: 4:22-cv-00840-SRC
Service Fee	
Summons	\$ 111
Non Est	·
Mileage	\$ (miles @ \$ per mile)
Total	\$
	See the following page for directions to officer making return on service of summons.
	see the renewing page for an extensite to officer making return on service of sufficients.

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.

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IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division:		Case Number: 2222-CC06392			
MICHAEL FRANCIS STEL	ZER VS.	Plaintiff's/Petitioner's Attorney/Ad SHAUN MICHAEL FALVEY BROWN & CROUPPEN 1 METROPOLITAN SQ STE 1600 SAINT LOUIS, MO 63102	ddress:		
Defendant/Respondent: BRANCH INTERMEDIATE Nature of Suit: CC Pers Injury-Vehicular	SCHOOL DISTRICT	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101		(Date File St	amp)
Sun		nal Service Outside the Sta	te of Miss	ouri	
The State of Missouri to:		kcept Attachment Action)			
520 HICKORY LANE COLDWATER, MI 49036	Mias.		SPECIA	L PROCESS	SERVER
V P	which is attached, and to blaintiff/petitioner at the rou, exclusive of the dataken against you for the July 6, 2022	appear before this court and to file to serve a copy of your pleading up above address all within 30 days by of service. If you fail to file your the relief demanded in this action.	pon the attor after service pleading, jud	ney for the of this summo	ns upon ult will be
F	Date urther Information:		Cleri	k ' ()	
2. My official title is 3. I have served the about delivering a copy of defendant/resport over the age of 1 (for service on a	rve process in civil action ove summons by: (check of the summons and a cop ident with 5 years who permanently corporation) delivering a	resides with the defendant/responde copy of the summons and a copy of the (name)	spondent. or usual abode of the defendant. ne petition to	y, e of the ant's/respondent'	(state). s family
•			•		·
		(state), on	(date		
	I am: (check one)	before me this (day) ne clerk of the court of which affiant is ne judge of the court of which affiant is uthorized to administer oaths in the st ummons. (use for out-of-state officer) uthorized to administer oaths. (use fo	an officer. an officer. ate in which th	ne affiant served	

	e: 4:22-cv-00840-SRC
Service Fee	is .
Summons	\$
Non Est	\$
Mileage	\$ (miles @ \$ per mile)
Total	s por miles
	See the following page for directions to officer making return on service of summons.
	See the following page for directions to officer making return on service of summons.

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Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.

Case: 4:22-cv-00840-SRC Doc. #: 1-1 Filed: 08/10/22 Page: 11 of 14 PageID #: 17

AFFIDAVIT OF RETURN OF SERVICE

COUNTY OF BRANCH)

RE:

MICHAEL SMITH v. BRANCH

INTERMEDIATE SCHOOL

DISTRICT, et al.

Circuit Court-City of St. louis

State of Missouri

Case No. 2222-CC06392

Craig Osborne, an Agent of Markell & Associates, Inc., being duly sworn upon his oath, states that he is over the age of 18 years; that he is a disinterested party to this action; that he served a copy of the attached Summons and Petition on defendant Branch Intermediate School District, by personal service on Diane Shiery, authorized Designee, at 370 Morse St., Coldwater, Michigan 49036 on July 12, 2022, 2:07 p.m.

MARKELL & ASSOCIATES, INC.

Craig Osborne

Subscribed to and sworn before me, a Notary Public on this

14th of July, 2022.

LAURIE A NEWSOM

Notary Public - State of Michigan
County of Jackson
My Commission Expires Jul 13, 2023
Acting in the County of

Notary Public

Case: 4:22-cv-00840-SRC Doc. #: 1-1 Filed: 08/10/22 Page: 12 of 14 PageID #: 18



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

			11		
Judge or Division: MICHAEL FRANCIS STE	ELZER	Case Number: 2222-CC06392			
Plaintiff/Petitioner: MICHAEL SMITH		Plaintiff's/Petitioner's Attorney/Ad SHAUN MICHAEL FALVEY	ddress:		
		BROWN & CROUPPEN 1 METROPOLITAN SQ STE 1600			
The state of the s	VS.	SAINT LOUIS, MO 63102			
Defendant/Respondent: BRANCH INTERMEDIAT	E SCHOOL DISTRICT	Court Address:		(Date File Stamp)	
Nature of Suit:	L SCHOOL DISTRICT	CIVIL COURTS BUILDING 10 N TUCKER BLVD			
CC Pers Injury-Vehicular		SAINT LOUIS, MO 63101			
	(E:	al Service Outside the Sta	te of Missou	ri	
The State of Missouri to:	BRANCH INTERMEDIAT	E SCHOOL DISTRICT	***************************************		
370 MORSE STREET	Alias.				
COLDWATER, MI 49036			SPECIAL	ROCESSSERV	/ER
COURT SEAL OF	You are summoned to	appear before this court and to file	your pleading t	o the petition, copy	of
	which is attached, and the	o serve a copy of your pleading u above address all within 30 days	pon the attorney	for the	
(3() (S) (S) (S) (S)	you, exclusive of the da	y of service. If you fail to file your	pleading, judgm	ent by default will I	л be
	taken against you for th	e relief demanded in this action.			
CITY OF ST LOUIS	July 6, 2022	T.	homas Illo	eppinger	
	Date Further Information:		Clerk	7 0	-
		or Server's Affidavit of Service		-	
I certify that:	00010 mmaaaa la alah4		-		
2. My official title is		s within the state or territory where the			state).
	above summons by: (check				riato).
leaving a copy	of the summons and a con	opy of the petition to the defendant/re y of the petition at the dwelling place o	spondent. or usual abode of	the	
defendant/resp	oondent with	. a person	of the defendant's	s/respondent's family	,
over the age o	it 15 years who permanently a corporation) delivering a	resides with the defendant/responde copy of the summons and a copy of the	nt. se petition to		
-		(name)	•	(t	itle).
					·
				(addres	
in	County,	(state), on	(date) at	(time)).
			-		
	me of Sheriff or Server	hoforo me this	Signature of Sher		
,	I am: (check one)	before me this (day) ne clerk of the court of which affiant is	an officer.	nonth)(y	ear).
		ne judge of the court of which affiant is			
(Seal)	∟ a s	uthorized to administer oaths in the st ummons. (use for out-of-state officer)	ate in which the a	mant served the abo	ve
		uthorized to administer oaths. (use fo		server)	
			Signature and Titl	e	

Case: 4:22-cv-00840-SRC Doc. #: 1-1 Filed: 08/10/22 Page: 13 of 14 PageID #: 19

AFFIDAVIT OF RETURN OF SERVICE

COUNTY OF BRANCH)

RE:

MICHAEL SMITH v. BRANCH

INTERMEDIATE SCHOOL

DISTRICT, et al.

Circuit Court-City of St. louis

State of Missouri

Case No. 2222-CC06392

Craig Osborne, an Agent of Markell & Associates, Inc., being duly sworn upon his oath, states that he is over the age of 18 years; that he is a disinterested party to this action; that he served a copy of the attached Summons and Petition on defendant Suzanne Coco, by personal service, at 520 Hickory Ln., Coldwater, Michigan 49036 on July 12, 2022, 2:29 p.m.

MARKELL & ASSOCIATES, INC.

Craig Osborne

Subscribed to and sworn before me, a Notary Public on this

LAURIE A NEWSOM Notary Public - State of Michigan County of Jackson My Commission Expires Jul

Acting in the County of

Notary Public

Case: 4:22-cv-00840-SRC	Doc. #: 1-1	Filed: 08/10/22	Page: 14 of 14 Pag	geID #: 20

ALL THE STATE OF T	
大量	
(NEW SERV)	
THE COURT	

CITY OF ST LOUIS

IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

**************************************		1!!	
Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2222-CC06392		
Plaintiff/Petitioner: MICHAEL SMITH Vs.	Plaintiff's/Petitioner's Attorney/Address: SHAUN MICHAEL FALVEY BROWN & CROUPPEN 1 METROPOLITAN SQ STE 1600 SAINT LOUIS, MO 63102	The state of the s	·
Defendant/Respondent: BRANCH INTERMEDIATE SCHOOL DISTRICT Nature of Suit: CC Pers Injury-Vehicular	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101		(Date File Stamp)
Summons for Personal Service Outside the State of Missouri			

Summons for Personal Service Outside the State of Missour (Except Attachment Action)

i ne State of Missouri to:	SUZANNE COCO Alias:
520 HICKORY LANE COLDWATER, MI 49036	
COURT SEAL OF	You are summoned to appear before this court an

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be

SPECIAL PROCESS SERVER

taken against you for the relief demanded in this action.

July 6, 2022

Thomas /lloeppinger

Clerk

Clerk

Clerk Further Information:
I certify that: 1. I am authorized to serve process in civil actions within the state or territory where the above summons was served. 2. My official title is
1. I am authorized to serve process in civil actions within the state or territory where the above summons was served. 2. My official title is
2. My official title is
3. I have served the above summons by: (check one) delivering a copy of the summons and a copy of the petition to the defendant/respondent. leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with
delivering a copy of the summons and a copy of the petition to the defendant/respondent. leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent. [(for service on a corporation) delivering a copy of the summons and a copy of the petition to (name) (title). [other: (address)
leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with
defendant/respondent with
over the age of 15 years who permanently resides with the defendant/respondent. (for service on a corporation) delivering a copy of the summons and a copy of the petition to
(for service on a corporation) delivering a copy of the summons and a copy of the petition to(title)
Other:
Served at (address)
Served at (address)
(date) at (arre).
Printed Name of Sheriff or Server Signature of Sheriff or Server
Subscribed and sworn to before me this (day) (month) (year).
am: (check one) the clerk of the court of which affiant is an officer.
the judge of the court of which affiant is an officer.
authorized to administer oaths in the state in which the affiant served the above
(Seal) summons. (use for out-of-state officer)
authorized to administer oaths. (use for court-appointed server)
Signature and Title